



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

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J. Gordon Stephens, Jr., Treasurer
Burson-Marsteller Political
Action Committee
1850 M Street, NW, Ste. 900
Washington, DC 20036

MAP R 1995

Identification Number: C00201863

Reference: Amended Year End Report (7/1/93-12/31/93) dated
12/15/94

Dear Mr. Stephens:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-The total listed on Line 11(d), Column B of the Detailed Summary Page appears to be incorrect. Please be advised that you should add the "Calendar Year-to-Date" total from your previous report to the current "Total This Period" figure from Column A to derive the correct Line 11(d), Column B total.

-Schedule A supporting Line 11(a)(i) of your report discloses contributions received through what appears to be a payroll deduction plan. Please amend your report to disclose the frequency of deduction. 11 CFR §104.8(b) Please refer to the enclosed sample of properly reported payroll deductions.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,

Neil Evans
Reports Analyst
Reports Analysis Division

PAYROLL DEDUCTIONS

SCHEDULE A ITEMIZED RECEIPTS		Use separate schedule if more than one Individual Donor.		NAME OR PCF FOR LINE NUMBER 11(a)(3)
Contributions from Individuals				
Any information copied from FEC Forms and Statements may not be used or cited by any person for the purpose of making contributions or for other political purposes, other than using the name and address of any political committee to which contributions have been made.				
NAME OF COMMITTEE OR PAC National Organization PAC 000000000				
A. Full Name, Mailing Address and Zip Code		Name of Donor	Date Rec'd. Pay per Payroll Deduction	Amount of Total Payroll Deduction
Anne Sullivan 81 18th Street City, State ZIP		National Organization, Inc.	payroll deduction	\$72.00
Amount Rec'd. From Other sources		Chairman, Strategic Manager Aggregate Year-to-Date > \$		(812 Strategic)
B. Full Name, Mailing Address and Zip Code		Name of Donor	Date Rec'd. Pay per Payroll Deduction	Amount of Total Payroll Deduction
Rodney Jones 601 Salisbury Road City, State ZIP		National Organization, Inc.	payroll deduction	\$120.00
Amount Rec'd. From Other sources		Chairman Vice President Aggregate Year-to-Date > \$		(820 Vice President)

Itemize payroll deductions only after they have exceeded \$200 per calendar year from an individual.

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IN-KIND CONTRIBUTIONS

SCHEDULE A ITEMIZED RECEIPTS		Use separate schedule if more than one Individual Donor.		NAME OR PCF FOR LINE NUMBER 11(a)(3)
Contributions from Individuals				
Any information copied from FEC Forms and Statements may not be used or cited by any person for the purpose of making contributions or for other political purposes, other than using the name and address of any political committee to which contributions have been made.				
NAME OF COMMITTEE OR PAC National Organization PAC 000000000				
A. Full Name, Mailing Address and Zip Code		Name of Donor	Date Rec'd. Pay per Payroll Deduction	Amount of Total Payroll Deduction
Martin L. Evans 4 River Road City, State ZIP		National Organization, Inc.	8/19/98	\$2,000.00 (100-XXXX) CRAPPY PANTS
Amount Rec'd. From Other sources		Chairman Aggregate Year-to-Date > \$		

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SCHEDULE A ITEMIZED RECEIPTS		Use separate schedule if more than one Individual Donor.		NAME OR PCF FOR LINE NUMBER 21(b)
Operating Expenditures/Other Federal				
Any information copied from FEC Forms and Statements may not be used or cited by any person for the purpose of making contributions or for other political purposes, other than using the name and address of any political committee to which contributions have been made.				
NAME OF COMMITTEE OR PAC National Organization PAC 000000000				
A. Full Name, Mailing Address and Zip Code		Name of Donor	Date Rec'd. Pay per Payroll Deduction	Amount of Total Payroll Deduction
Martin L. Evans 4 River Road City, State ZIP		Public price	8/19/98	\$5,000.00 (100-XXXX) CONTRIBUTION
Amount Rec'd. From Other sources		Chairman Aggregate Year-to-Date > \$		

Itemize in-kind contributions on both Schedules A and B so as not to inflate the cash-on-hand amount.

Payroll Deductions

Once an individual's deductions aggregate over \$200 in a calendar year, report the total amount deducted from the donor's paychecks during the reporting period on Schedule A. In parentheses indicate the amount that was deducted each pay period. Instead of stating a specific date of receipt, write "payroll deduction" under "Date." The other itemized information, including the year-to-date total, must be completed for each donor. 104.8(b).

EXAMPLE: During an election year, a corporate manager authorizes her employer to deduct \$12 per pay period (each pay period is two weeks) for the company's SSF. The SSF, which files FEC reports on a quarterly schedule, includes the manager's contributions as "unitemized contributions" in its April and July quarterly reports. By June 30, the closing date for the July report, the manager's aggregate contributions are \$195 — still below the \$200 itemization threshold. By September 30 — the closing date for the October quarterly report — the manager's contributions reach \$228. Therefore, the committee itemizes the total contributions received from the manager during the third quarter (\$120), providing the year-to-date total in the appropriate space. (See Item A in the illustration above.)

In-Kind Contributions

When determining whether to itemize an in-kind contribution, follow the same guidelines listed above under "When to Itemize Receipts." See Chapter 2 for information on how to determine the dollar value of an in-kind contribution.

In addition, add the value of the in-kind contribution to the operating expenditures total on Line 21(b) (in order to avoid inflating the cash-on-hand amount). 104.13(a)(2).

If the in-kind contribution must be itemized on Schedule A, then it must also be itemized on a Schedule B for operating expenditures. See the illustration at right.

Appreciated Goods

When a committee receives an in-kind contribution whose value may

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